

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

APRIL LAYTON, as personal)	
Representative of the Estate of)	
Charles Holdstock, deceased, et al,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: CIV-2009-1208-C
)	
CORRECTIONAL HEALTHCARE)	
MANAGEMENT OF OKLAHOMA, INC., a)	
corporation, et al,)	
)	
Defendants.)	

**BOARD OF COUNTY COMMISSIONERS OF OKLAHOMA COUNTY’S
REQUESTED VOIR DIRE TO BE POSED TO THE JURY PANEL**

COMES NOW, the Board of County Commissioners of Oklahoma County (hereinafter “BOCC”), by and through counsel, Lisa Erickson Endres, Assistant District Attorney, and respectfully requests the following questions be posed to the jury panel during the voir dire:

1. Have you ever been employed by Oklahoma County, including any of the elected officials for the County, in any capacity? If the answer to the above question is yes, please ask:
 - which official did you work for?
 - why did you leave your employment with the county?
 - do you have any feelings, negative or otherwise that would affect your ability to be fair in this proceeding?

2. Have you ever worked for any kind of law enforcement agency?

-describe which governmental entity and what kind of position you held?

3. Have you or anyone in your immediate family had any of the following medical conditions?

- Diabetes
- Diabetes mellitus, type II or unspecified (NIDDM) (DM)
- Congestive Heart Failure or Severe Congestive Heart Failure (CHF)
- Hypertension (HTN)
- Dilated cardiomyopathy
- Cardiomegaly
- Hypertensive atherosclerotic cardiovascular disease
- Hyperglycemic
- Hypoglycemic
- Myocardial injury
- Myocardial necrosis
- Angina
- High cholesterol
- Dyslipidemia
- Degenerative joint disease
- Pacemaker
- Advanced / Severe cardiac disease
- Osteoporosis
- Internal hemorrhoids without complication
- Diverticulosis, colonic
- PTSD
- Hypertrophy, benign, of prostate
- Depression
- Osteoarthritis
- Cancer, basal cell
- Actinic keratosis
- Hyperlipidemia
- Pulmonary hypertension

-If yes, please list the medications you take for each medical condition and the name of your treating physician for each medical condition.

4. Do you or anyone in your immediate family been prescribed have taken or are currently taking any of the following medications or a derivative form of the following medications?

- Metformin HCL (Glucophage)
- Acarbose (Precose)
- Hydrocodone
- Simvastatin
- Rosiglitazone Maleate
- ECASA – enteric coated aspirin
 - prescribed Aspirin
- Lopressor HCT (Metoprolol)
- Digoxin (Lanoxin)
- Lisinopril (Zestril, Prinivil)
- Furosemide (Lasix)
- Glipizide (Glucotrol)
- Lopid (Gemfibrozil)
- Glucagon SC
- Naprosyn (Naproxen)
- Ibuprofen
- KCL (Potassium Chloride)
- Benadryl (Diphenhydramine)
- Lipitor (Atorvastatin)
- Feldene (Piroxicam)
- Zantac (ranitidine)
- nitroglycerin SL
- Tylenol (acetaminophen)
- Elavil (Amitriptyline)
- Mevacor (Lovastatin)
- Robaxin (methocarbamol)
- Esmolol (Brevibloc)
- Tagamet (Cimetidine)
- Coreg (Carvedilol)
- K+ (potassium)
- prenatal vitamin
- s/s regular insulin
- NPH insulin
- Sulindac
- Sertraline HCL (Zoloft)
- Cyclobenzaprine HCL (Flexeril)
- Ofloxacin (Floxin)
- Fluorouracil (Adrucil)
- Temazepam (Restoril)

- Guaifenesin (Robitussin)
- Fexofenadine HCL (Allegra)
- Atenolol (Tenormin)
- codeine/acetaminophen
- Spironolactone (Aldactone)
- Enalapril maleate (Vasotec)

-If you are taking any of the above medications, please disclose the medical condition for which you are taking each medication.

5. Have you or anyone in your immediate family ever been incarcerated, held or detained in the Oklahoma County Detention Center otherwise known as Oklahoma County jail or any other jail, prison or detention center as either an adult or juvenile?

-If so, what were you held for and for how long?

-Did you receive any medical treatment while detained or held in jail and if so, what medical treatment did you receive?

-How do you feel you were treated while in jail?

-Would your experience of having been held in a jail facility affect your ability to be impartial and fair in this case?

6. Have you or anyone in your immediate family ever been a party to or a witness to a medical malpractice lawsuit or any kind of lawsuit in which you or your family member was asserting a violation of constitutional rights?

-If so describe the case and your involvement in it, including any outcome the jury reached.

-Would your experience or knowledge about the medical malpractice litigation or constitutional rights litigation affect your ability to be impartial and fair in this case?

7. Have you or anyone in your immediate family hired, retained or been represented by attorney Charles Holdstock or been on the opposing side in any case in which Charles Holdstock was involved as an attorney?

8. Have any of you read any newspaper articles or heard anything in the news media about the conditions at the Oklahoma County Detention Center or regarding any deaths that occurred in the Oklahoma County Detention Center.

- What have you seen or heard

- Will that have any effect on being able to be fair and impartial in this case

9. Do any of you have a medical background or worked or studied in the medical profession?
 - If so, please describe your medical background and work or study history, including job title, dates of employment, job responsibilities, subject areas studied, degrees received or sought.
10. Have you or anyone in your immediate family ever been party to a contract in which one of the parties was sued or accused of failing to perform under the contract?
 - If so, please describe the type of contract, the dispute and the resolution
 - Did the failure of performance cause any additional problems to any other parties outside of that contract?

Respectfully Submitted,

By: /s/ Lisa Erickson Endres
Lisa Erickson Endres, OBA# 16647
Assistant District Attorney
320 Robert S. Kerr, Room 505
Oklahoma City, Oklahoma 73102
Telephone: (405) 713-2303
Facsimile: (405) 713-1749
dalisend@oklahomacounty.org
Attorney for BOCC & Sheriff Whetsel

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September 2013, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

E. W. Keller
KELLER, KELLER & DALTON
119 N. Robinson, Ste. 825
Oklahoma City, OK 73102
Attorney for Plaintiffs

/s/Ronnisha Wiley, Legal Assistant